

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
JAMES JOHN KUBASKO	:	5-20-00462
	:	
DEBTOR(S)	:	CHAPTER 13

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JAMES JOHN KUBASKO,	:	
MOVANT,	:	

VS.

LACKAWANNA COUNTY TAX CLAIM	:	
BUREAU, JEFFERSON TWP., C/O	:	
PORTNOFF LAW ASSOCIATES,	:	
JEFFERSON TWP. SEWER AUTHORITY,	:	
MOOSIC LAKES, PNC BANK,	:	
INTERNAL REVENUE SERVICE, PA	:	
DEPARTMENT OF REVENUE AND	:	
JACK N. ZAHAROPOULOS, CHAPTER	:	
13 TRUSTEE,	:	

RESPONDENTS.

.....

**OBJECTION OF MARK ALLEN CROWELL AND SHARON PETROSKY-CROWELL  
TO DEBTOR'S MOTION TO APPROVE PRIVATE SALE OF REAL AND PERSONAL  
PROPERTY FREE AND CLEAR OF ALL LIENS, CHARGES AND ENCUMBRANCES IN  
THE NATURE OF A HIGHER AND BETTER OFFER**

**AND NOW COMES,** Mark Allen Crowell and Sharon Petrosky-Crowell

("Objectors") by and through their attorney John J. Martin and file this Objection to Debtor's Motion to Approve Private Sale of Real and Personal Property Free and Clear of All Liens, Charges and Encumbrances in the Nature of a Higher and Better Offer as follows:

1. That the Debtor's pending motion proposes a sale price of \$510,000.00.
2. That Objectors believe and therefore aver that the real and personal property proposed to be sold have a value in excess of \$510,000.00.

3. That Objectors are offering to pay the sum of \$550,000.00 under the same and or similar terms and conditions as set forth in the Debtor's sale motion and exhibits.

4. That Objectors believe and therefore aver that it would be in the best interest of the Debtor and the bankruptcy estate for the Court to sustain this objection and authorize a sale by the Debtor to the Objectors for the sum of \$550,000.00 under the same and or similar terms and conditions as set forth in the Debtor's sale motion and exhibits.

**WHEREFORE**, Objectors respectfully requests this Honorable Court to

(1) sustain this Objection to Debtor's Motion to Approve Private Sale of Real and Personal Property Free and Clear of All Liens, Charges and Encumbrances in the Nature of a Higher and Better Offer;

(2) authorize a sale by the Debtor to the Objectors for the sum of \$550,000.00 under the same and or similar terms and conditions as set forth in the Debtor's sale motion and exhibits;  
and

(3) for such other and further relief as the Court deems just and proper.

Dated: October 19, 2021

Respectfully submitted,

/s/ John J. Martin, Esquire  
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Attorney For Objectors  
Mark Allen Crowell and  
Sharon Petrosky-Crowell